

ORIGINAL

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

RIVERKEEPER, INC., NATURAL
RESOURCES DEFENSE COUNCIL,
WATERKEEPER ALLIANCE, INC.,
SOUNDKEEPER, INC., DELAWARE
RIVERKEEPER NETWORK, AMERICAN
LITTORAL SOCIETY, RARITAN
BAYKEEPER, INC. d/b/a NY/NJ BAYKEEPER,
SAVE THE BAY – PEOPLE OF
NARRAGANSETT BAY, FRIENDS OF CASCO
BAY, SANTA MONICA BAYKEEPER, INC.,
SURFRIDER FOUNDATION,
MASSACHUSETTS PUBLIC INTEREST
RESEARCH GROUP, INC.

Plaintiffs,

vs.

UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY and STEPHEN L.
JOHNSON, in his official capacity as
Administrator of the United States Environmental
Protection Agency,

Defendants.

Civil Action No. 06 CV 12987
ECF case

**UNOPPOSED
MOTION TO ADMIT COUNSEL
PRO HAC VICE**

FILED
2007 FEB 15 PM 2:26
S.D. OF N.Y.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Reed Super a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

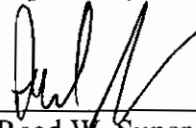
Edward Lloyd
Environmental Law Clinic
Columbia University School of Law
435 West 116th Street
New York, NY 10027
(212) 854-4376
(212) 854-3554 (fax)

Edward Lloyd is a member in good standing of the Bar of the State of New Jersey. There are no pending disciplinary proceeding against Edward Lloyd in any State or Federal court. I am submitting herewith the Affidavit of Reed Super in Support of this Motion.

Dated: New York, NY
February 14, 2007

Of Counsel:
P. Kent Correll, Esq. (PC-2609)
300 Park Avenue, 17th Floor
New York, NY 10022
212-475-3070
212-475-2378 (fax)

Respectfully submitted,



Reed W. Super (RS-3615)
Environmental Law Clinic
Columbia University School of Law
435 West 116th Street
New York, NY 10027
(212) 854-3365
(212) 854-3554 (fax)

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**AFFIDAVIT OF REED W. SUPER
IN SUPPORT OF UNOPPOSED
MOTION TO ADMIT COUNSEL
PRO HAC VICE**

Reed W. Super, being duly sworn, hereby deposes and says as follows:

1. I am the Staff Attorney at the Columbia University School of Law Environmental Law Clinic and counsel for Plaintiffs Riverkeeper, Inc., Natural Resources Defense Council, Waterkeeper Alliance, Inc., Soundkeeper, Inc., Delaware Riverkeeper Network, American Littoral Society, Raritan Baykeeper, Inc. d/b/a NY/NJ Baykeeper, Save the Bay—People for Narragansett Bay, Friends of Casco Bay, and Santa Monica Baykeeper, Inc., and Surfrider Foundation in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in

support of Plaintiffs' unopposed motion to admit Edward Lloyd as counsel pro hac vice to represent Plaintiffs Riverkeeper, Inc., Natural Resources Defense Council, Waterkeeper Alliance, Inc., Soundkeeper, Inc., Delaware Riverkeeper Network, American Littoral Society, Raritan Baykeeper, Inc. d/b/a NY/NJ Baykeeper, Save the Bay—People for Narragansett Bay, Friends of Casco Bay, and Santa Monica Baykeeper, Inc., and Surfrider Foundation in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 2000. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Edward Lloyd since 1999.
4. Mr. Lloyd is a Clinical Professor at the Columbia University School of Law Environmental Law Clinic in New York, NY.
5. I have found Mr. Lloyd to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Edward Lloyd, pro hac vice.
7. I have consulted with counsel for all parties in this matter and each has stated that she/he does not oppose this motion.
8. I respectfully submit a proposed order granting the admission of Edward Lloyd, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Edward Lloyd, pro hac vice, to represent Plaintiffs Riverkeeper, Inc., Natural Resources Defense Council, Waterkeeper Alliance, Inc., Soundkeeper, Inc., Delaware Riverkeeper Network, American Littoral Society,

Raritan Baykeeper, Inc. d/b/a NY/NJ Baykeeper, Save the Bay—People for Narragansett Bay, Friends of Casco Bay, and Santa Monica Baykeeper, Inc., and Surfrider Foundation in the above captioned matter, be granted.

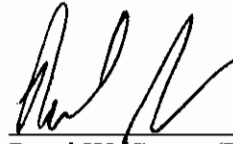
Dated: New York, NY
February 14, 2007

Notarized:



MARY MARSH ZULACK
Notary Public, State of New York
No. 02ZU5007710
Qualified in Kings County
Commission Expires February 1, 2007

Respectfully submitted,



Reed W. Super (RS-3615)

UNITED STATES DISTRICT COURT
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**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN UNOPPOSED
MOTION**

Upon the motion of attorney for and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Edward Lloyd
Environmental Law Clinic
Columbia University School of Law
435 West 116th Street
New York, NY 10027
(212) 854-4376
(212) 854-3554 (fax)
elloyd@law.columbia.edu

is admitted to practice pro hac vice as counsel for Plaintiffs Riverkeeper, Inc., Natural Resources Defense Council, Waterkeeper Alliance, Inc., Soundkeeper, Inc., Delaware Riverkeeper Network, American Littoral Society, Raritan Baykeeper, Inc. d/b/a NY/NJ Baykeeper, Save the Bay—People for Narragansett Bay, Friends of Casco Bay, Santa Monica Baykeeper, Inc., and Surfrider Foundation in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

February 14, 2007
New York, NY

United States District/Magistrate Judge

Supreme Court of New Jersey

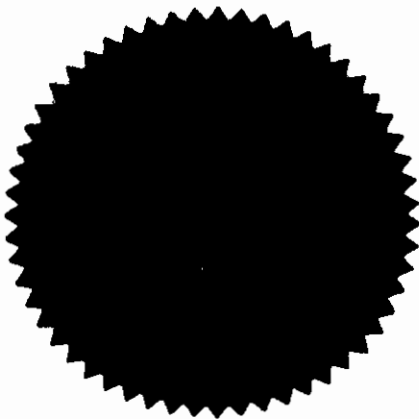


Certificate of Good Standing

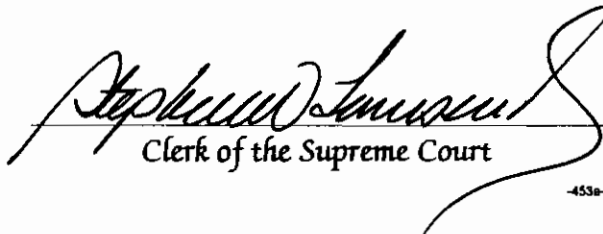
This is to certify that **EDWARD L LLOYD**
(No. **003711974**) was constituted and appointed an Attorney at Law of New
Jersey on **May 29, 1974** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
24TH day of January , 20 07


Clerk of the Supreme Court

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of February 2007, I caused to be served by electronic mail one copy of the following:

An Unopposed Motion to Admit Counsel Pro Hac Vice for Edward Lloyd; and

An Affidavit of Reed Super in Support of this Motion.

on:

Wendy H. Waszmer
Assistant United States Attorney
Southern District of New York
86 Chambers Street, 3rd Floor
New York, New York 10007
Counsel for Defendants

Russell S. Frye
3050 K. Street, NW
Suite 400
Washington, DC 20007-5108
*Counsel for Movant for
Intervention Cooling Water
Intake Structure Coalition*



Reed W. Super